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Attorney for Debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: : CHAPTER 13

Carline Simeon : CASE NO. 19-12922

Debtor : HONORABLE STACEY L. MEISEL

ATTORNEY'S RESPONSE TO CREDITOR'S CERTIFICATION OF DEFAULT

I, Russell L. Low, Esq. hereby certify the following:

1. I, Russell L. Low, Esq. represent the debtor Carline Simeon in this bankruptcy proceeding.
2. A Certification of Default was filed by Freedom Mortgage.
3. Several attempts were made to contact the debtor and address this motion however a response was not received in time to file an opposition.
4. Therefore, more time is being requested to contact the debtor and address the arrears.

I hereby certify that the foregoing statements made by me are true and correct to the best of my knowledge.

Date: July 8, 2021

/s/ Russell L. Low
Russell L. Low, Esq.
Attorney for Debtor